

RE: MICHAEL JOSEPH ZITA

) Case No. 15 B 21351  
)  
Debtor ) Chapter 13  
)  
) Judge: CAROL A DOYLE

**NOTICE OF MOTION**

MICHAEL JOSEPH ZITA

SULAIMAN LAW GROUP LTD  
via Clerk's ECF noticing procedures

181 HERRICK ROAD  
RIVERSIDE, IL 60546

Please take notice that on March 29, 2016 at 9:15 am my designee or I will appear before the Honorable Judge CAROL A DOYLE at 219 South Dearborn Courtroom 742, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on March 11, 2016.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR TERM OF PLAN**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On June 19, 2015 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on January 05, 2016, for a period of 60 months.
3. The plan will complete in 75 months, from the date of confirmation .

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to § 1322 (d) and § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn